



Responsible Down Standard In-Person Meeting

3:30 – 5:30 pm PST, November 12th, 2014 - Portland, Oregon

Agenda

(We will work through as much of this agenda as time allows)

1. Introductions
2. Housekeeping
3. Updates
4. Feedback
5. Film: Fjallraven Promise
6. Consensus items
 - a. Consensus achieved (TOR, pages 1-8)
7. Farm Module
 - a. Review any additional changes submitted
 - b. Decide on continuous lighting

NEW – CONFIRM RDS LOGO - ** (FOR TRADEMARKING)

8. Unannounced Visits
9. Parent Farm Optional Module
10. Logo and labeling
11. Chain of Custody for Small Farms
12. Slaughter Module
13. Transport Module

1. Introductions

2. Housekeeping

√ **Chatham House Rules**

When a meeting, or part thereof, is held under the Chatham House Rule, participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed. -

See more at: <http://www.chathamhouse.org/about/chatham-house-rule#sthash.MQ0rYRTe.dpuf>

√ **Timing and Decision-making**

Decision-making for the RDS is done by the Steering and Technical Committee members, based on consensus whenever possible.

As we move through the standard, we will be assuming consensus approval on the sections of work being done if nobody raises any objections with a given timeframe.

When we have a final draft of the revised standard, we will then put it out for full stakeholder review. We will give people 4-6 weeks to send in comments, then we will publicly reply to these comments, and make any additional changes to the standard.

We will then bring the updated draft of RDS v2 to the Steering and Technical Committee members for consensus approval, and at this stage, we will ask them to 'vote' their approval. If there are any strong objections from within the voting members to approving the standard, we will let the people who are raising these issues explain them to the group on a call, and we will try to get agreement. If not, we will move to a vote, and in the event of a tie, TE will make the final decision.

My hope is that we can continue to move through the issues steadily, and can have a draft ready for stakeholder review by early December. We will collect and respond to all comments by early January, then try for voting approval. I'd really like to have it released by Jan 27th, 1 year after version one.

3. Updates

√ **IOAS**

“I wanted to report back to you after our recent Board meeting where we discussed further our involvement in Responsible Down.

Although there were doubts expressed and we would like to encourage TE to move all their standards to prohibit GMO or use language such as ‘avoid GMO where possible’ to push in the right direction the Board agreed that the IOAS will provide accreditation against this standard.

I seem to remember you were looking to launch the programme in the New Year. In that light we will prepare ourselves to accept applications from then.

Please keep us up to date with developments.”

Regards, David

David Crucefix PhD
Executive Director (Business)
IOAS

√ **Uptake**

We now have roughly 20 brands that have publicly committed or have **non-publicly** started activity with the RDS. There is further interest from general retail, and even hospitality. **We now have close to a million pounds of certified down.**

√ **Media Coverage**

Moncler – production out of Italy. A video posted about the company includes horrific images of the treatment of ducks and geese. Stock price lost 4.8% because of this. There was an article accompanying the video. They are charging €900-1000 for a garment, \$49 to make. The down part was 10% of the video. The makers of the video did not link the farms being filmed to actual Moncler production.

RDS Media

There have been 22 unique articles so far generating a total of 61,987,255 impressions.

In addition, there have been 23 radio interviews with Canada’s national radio, CBC.

Noteworthy social amplification by Fortune, CSRwire, Sustainable Brands, Triple Pundit, The North Face, Textile Exchange, plus influencers Julie Urlaub, Leon Kaye, and Nadine Hack.

U.S. Coverage

- ***NEW* CSRwire** (John Howell, 10/24/14): Brands Commit to Responsible Down Standard
- ***NEW* Blue Ridge Outdoors** (Aaron Bible, 10/24/14): Eddie Bauer, The North Face, Marmot, Others, Commit To More Responsible Down Standard
- **Sustainable Brands** (Mike Hower, 10/23/14): The North Face, H&M, Eddie Bauer Commit to More Responsible Down
- **Fashion United** (Staff, 10/23/14): H&M, The North Face and Eddie Bauer to source ethical down
- **Environmental Leader** (Staff, 10/22/14): H&M, Eddie Bauer, The North Face, Others Commit to More Responsible Down
- **Women's Wear Daily** (Arthur Friedman, 10/22/14): Brands Sign On to Textile Exchange's Responsible Down Standard
- **Bloomberg Businessweek** (Kyle Stock, 10/20/14): North Face and H&M Try to Clean Up the Down Business
- **EcoTextile News** (Stacey Dove, 10/21/14): More brands commit to responsible down
- **Fortune** (Mary Catherine O'Connor, 10/21/14): Was that down jacket humanely made?
- **Huffington Post** (Anne Gillespie, 10/21/14): Responsible Down Standard Wakes Up An Industry
- **Sourcing Journal** (Lainie Lamicella, 10/21/14): Leading Brands H&M, The North Face Adopt Responsible Down Standard
- **Sports One Source** (Staff, 10/21/14): Responsible Down Standard Gains Wide Adoption
- **Triple Pundit** (Nayelli Gonzalez, 10/21/14): The North Face Launches Collaborative Standard for Responsible Down
- **Triple Pundit** (Nayelli Gonzalez, 10/21/14): Major Apparel Brands Join Forces for Responsible Down
- **Slate** (Lily Hay Newman, 10/29/2014): What's Good for the Goose

EU & Canadian Coverage – Translations Pending

- **Retail News.NL** (Staff 10/23/14): Retailers tekenen dierenwelzijnsverdrag
- **Vo2.fr** (10/22/14): The North Face starts the movement toward more responsible duvet
- **Outdoor Magazyn** (10/22/14): Wiodące marki podejmują działania na rzecz poprawy warunków hodowli zwierząt
- **TextilWirtschaft** (10/22/14): Neuer Daunen-Standard für mehr Tierschutz
- **FMag** (10/22/14): Bienestar animal: plumones "responsables" garantizados
- **Green Logistique** (10/22/14): The North Face et le Responsible Down Standard
- **Fashion United** (Mittwoch, 10/22/14): Marken führen „Responsible Down Standard“ ein
- **Fashion United** (Woensdag, 10/22/14): Modebedrijven als H&M en Helly Hansen in bres voor dons

- **Just Style** (Leonie Barrie, 10/21/14): H&M and The North Face Commit to Responsible Down
- **La presse** (10/21/14): Bien-être animal: des doudounes garanties plumes «responsables»

Noteworthy Press Release Pickups

- Boston Globe (10/21/14)
- International Business Times (10/21/14)
- Yahoo! Finance (10/21/14)
- Bedroom Magazine_(10/21/14)
- Just Means (10/21/14)
- ANSA_(10/21/14)
- AFP économique_(10/21/14)
- El Economista_(10/22/14)
- UKClimbing.com (10/24/14)

√ **Supplier Training**

Given the number of companies that are signing onto the RDS, we'd like to know if there is an interest in holding any joint supply chain training efforts in China and in Eastern Europe.

Some are working on training in Asia and EU around understanding documentation and segregation; working to build trust instead of just fear of reporting on them.

Down is a byproduct and if it is reported to the product, they don't want to be a part of it.

There is fear of reading documentation or even signing their name, that it will make them more open to government scrutiny. Training is also about assuring the supply chain members.

Brand – farmer, collector, slaughterhouse, and garment training (cut and sew) on 11 sites with the CU HK office with CCS. Audits will happen in the next 6 weeks. Cut and sew is the most critical for down compared to other materials.

If you need trainings, use TE to do so.

Brand – when you go to a supplier and say you want RDS down, how do you verify? Published certified list will show you who is able to produce it. Some down suppliers have been solicited with fake RDS down.

Brand – how can we follow-up with tier 1 suppliers that say they are going to be certified in the future? The CB will know once they are certified, but it takes some level of trust to trust that a supplier will become certified in the future. Tier 2, you can look at timelines as a first check whether it is possible to be certified.

With the RDS v2, with the new requirements, how will the transition work? Most of the supply of RDS v1 will be used up quickly, but the transition policy for RDS v2 will include guidance on using up existing v1 stock.

Outcomes:

Important topics for supplier training:

- Documentation
- Segregation
- Building trust between the supplier and buyer

Target suppliers

- Farm, collectors, slaughterhouse, cut and sew

Partners

- TE is a strong partner for implementing RDS training
- The Certification Body can help in some instances, as long as it's completely separate from an individual company's certification process

Follow-up

- TE to review the RDS v2 Transition Policy to ensure there is adequate time to use up existing v1 stock.

√ **Logo Change**

We will be changing the RDS logo to remove the 100% reference. This is because it is no longer needed to differentiate from blended products, and to avoid any potential FTC issues around declaring 100% down, given that most down contains a mixture of feathers.

FTC may not like us having the 100% nearby down because there is no such thing as 100% down (additional feathers, breakage, etc). In the EU you can label it 100%. Products are not allowed to be labeled with the Blended RDS logo, so the 100% will just be removed from the logo. In the guidelines, it must be clear that there are different label grades through the supply chain.

Outcomes

- RDS logo will no longer include 100% (effective immediately, with v1)
- Pamela Ravasio and Anne to follow-up on identification of label grades through the supply chain.

4. Feedback

Please feel free to provide feedback to Ashley at any time: (ashley@textileexchange.org)

Preparation for meetings

- a. What works well?
- b. What does not?
- c. What changes can we make?

Meeting follow-up

- a. What works well?
- b. What does not?
- c. What changes can we make?

5. Fjallraven Promise

<http://www.fjallraven.com/responsibility/nature-environment/animal-welfare/our-down-promise>

6. Consensus Items

Terms of Reference – consensus reached with no objections to these:

- “**Hatchling to finished product**” instead of egg to jacket.
- Adding **optional parent farms** module to the standard
- It will not be allowed to label a final product as blended.
 - o Blending is allowed of any product, for internal tracking of corporate commitments.

For example, the brand could say 30% of their products are RDS certified. It is allowed and is the brands choice. But this claim would not be allowed on any products. If a supplier is approved for blended, the TC will indicate the % blend.

Multiple options to get adoption is the best way to improve practices. Internal brand benchmarking will be the most common use of the “10% of our down is certified” as opposed to external marketing. Product labeling would not be allowed anyway.

Pages 1-8 (unannounced still TBD)

Please read pages 1-8 of the RDSAmendments.dox and provide any objections before December 5. Consensus will be assumed after that point.

7. Farm Module

Review changes in RDS Amendments.docx

Summary of changes:

- F6.7 for Continuous Lighting change
 - o From HSI: Young ducklings and goslings don't thermo regulate independently and therefore need a supplemental heat source at first—it's okay to have a 24 heat source that generates some light when they are young, for brooding
- Parallel production has been removed from the farm module.
 - o Questions to be answered: If there is a crossover of time in a season where 3 flocks are possible in a season, will those that are not assessed be allowed?
- Addition of a recommendation of no GMO feeding "whenever possible", requested by IOAS, an accreditation body.
- "...or for the length of their validity, whichever is longer" added to a number of requirements.
- Suggestion to remove close confinement reference, as it is not defined, and is actually covered in F6.13. Suggest to then make it a major.
- *There shall be no physical alterations of waterfowl such as, changed from physical alterations of waterfowl are prohibited* (the requirement is minor and so should not use the word *prohibited*).
- Question: F9.4 (Hatchlings shall not be thrown or dumped; they shall be paced gently from a height of not more than 12 inches (30.5 cm) or lower.
 - o It will be very difficult to verify unless you are there (although auditors can try to ask an employee an open-ended question like "how to do you unload the hatchings?") At the very least, this lets the farmer know that we are paying attention.
- Question about de-beaking – suppliers do not see this, masking them is more common. More common with chickens that do not have sufficient space. We could make just de-beaking a major.
 - o The need to "beak-trim" comes from some deficiency of the animals normal environment. If you are to require it, you have to have an environment enrichment requirement to help.
 - o To research further: Do you have an alternative for masks?

To-Do:

Read through the changes in RDS Amendments.docx and provide any feedback or additional information by December 3.

8. Unannounced Visits

Note that unannounced will be pure surprise visits.

This is quite possible and important. The slaughterhouses inform the farms about this requirement and this compels compliance.

1. What percentage of additional unannounced visits should we require? Should we use a percentage or a square root calculation? What number to use?

Original proposal: 100% announced + 10% unannounced for the farm level (5 % as visual inspections only, 5% as full inspections)

FOUR PAWS proposal: 70% announced, 30% unannounced for the farm level;

New Proposal

- Announced 90% or 70% (First audits are to be 100% announced)
- semi-announced (with 48 hour notice) 10% or 30%
- unannounced visits (surprise) additional 10%

Remaining Issues to be resolved

- Will selection of semi-announced and unannounced be risk based or random (selection in either instance would be determined by the auditors)
- Is the percentage from number of units globally or per country?
 - o Calling a farmer to confirm and then booking a flight to China in 48 hours is too difficult. If animals are there the farmer has to be there. We want the farmer cooperation, so at least in the beginning we don't want to be rude to them. It could be hours of driving in China or Europe.
- As a group, we should flag how these %'s are working so we can evaluate if we need to adjust them. Geography might affect %'s.
- Issues to be resolved for unannounced audits:
 - o Romania requires permission from government before unannounced audits. Some auditors may not be allowed to enter facilities
 - o This is also a food source. How is it handled in the meat industry? Unannounced audits may be different for them as ours is 48 hours.
 - o You can't hide much in 48 hours. The farm practice is the farm practice and you can't fix that in 2 days. You can also always look at a farm from the outside visually.
 - o Pre-reporting on a monthly or weekly basis could include the slaughter dates.
 - o Unannounced is difficult as they make phone calls from the slaughterhouse to see who's there but they are never there. So days in advance is needed.
 - o Risk factors
 - results from previous audits
 - any third party information
 - parent farms
 - if there has just been an unannounced audit (they feel they will be safe in the next year)
 - large size (greater amount of down that will be impacted)

- other?
- Timing of live-plucking
- Regional considerations

Outcomes

- Give feedback or any objections to the proposal of announced/unannounced above before Dec 5

Background Information on Unannounced Visits (from October)

CU: Actually, I sat now down to write to you about the unannounced audits. I passed by today (completely accidentally) a geese farm (not RDS) and there was a sign on the entrance (unfortunately I had no camera with me): 'entrance only by accompanied vets'. Furthermore I was also these days discussing with the auditors and there are major concerns with having us go to the farms unannounced and 'just enter' the farm. That's due to hygienic issues. There are all kind of regulations around safety, health and hygiene when entering the farm. Some of them keep these rules and request from any visitors, take it serious, some not at all. However, if there is an epidemic with huge financial effects, they will for sure look into who was at the farm, who was responsible etc. I understood that Four paws suggests us to undertake that we will respect hygiene rules. But two issues around that: a. we are not having any contract with the farm; if we do unannounced the first year, this will be the first time we meet the farmer (if he is there at all on the day of our visit) , so no way to get from them permission in advance; b. what hygiene rules shall we respect? How do we know that? We (cu) are not aware of the hygienic regulation and don't want to go into a situation whereby we could be responsible without having sufficient information. This latest is very important, as there might be local regulations on who can enter what farm, under what conditions etc. Even if the farmers don't keep those regulations in a daily practice, they might use those against us if any problem? I also remember Nina mentioning that in Hungary there is a law under which nobody can get unannounced to a farm and this makes their life difficult? What I would like to emphasize and I hope you understand, that we have to cover ourselves and don't enter into any situation whereby we disregard local laws.

Supplier: I think that Gyorgyi has also brought up some very key issues around health, safety, and legal liability that are all 100% relevant from the certifiers' point of view, as well. In speaking with one of our larger European suppliers last week around this topic, he made the comment that allowing unannounced / non-regulated visits to commercial duck/goose farms is analogous to allowing complete and open access to public water treatment systems which clearly does not happen in any civilized nation, for obvious public safety protection.

Supplier: In addition to the issue of Hygiene and violating LOCAL and COUNTRY laws. In our experience the biggest challenge is access. We do not know the locations of the Farms until we

have visited the Slaughterhouses or the collectors. If we are talking about true chain of custody or traceability. We have to (as you know) head up stream until we have the information of the farms location. Majority of the time this information is collected from the slaughterhouse (in china also the live-poultry markets, which are a whole other story) It is difficult enough to visit farms with announced visits. In China we find it easier, but in Europe for example FRANCE, forget about unannounced visits at the farms or slaughterhouses, you can't even have announced visits majority of the time. So if unannounced visits are required for 100% then in my opinion Hungarian, Polish, French, German etc countries and possibly even supply chains in Asia will never achieve the RDS requirements.

My position with Unannounced visits is if during the initial Audits if issues are discovered (signs of live-plucking, or bad shelters) the corrective actions are of course noted in the report. Then the site would have to agree and sign a waiver of some sort with possible unannounced visits in the future to ensure the that corrective actions have been satisfied.

In all honesty the hygiene issue for large industrial FARMS is the least of my concern for the RDS and the discussion of unannounced visits. In regards to hygiene the issue for me is to ensure the Safety of the Auditor. this is why it is critical to have announced visits. The slaughterhouses know if there are BIRD-FLU issues then the auditors are informed and they stay away from a particular region. We have experienced this plenty in China and if we had planned to do unannounced visits we would have walked right into a BIRD FLU area.

Supplier: First, strict hygienic rules have to be observed. In Germany, the farmer is responsible for preventing diseases to spread. So access is limited. This does not mean that auditors may not visit the farm, of course. Audits are possible.

According to the government vet, unannounced visits are problematic due to practical reasons: farmers are busy people and cannot take a few hours off at the drop of a hat. So if the auditor drops by even if the farmer is there, chances are he or she has no time. This is seen a waste by the vet who says that they usually give two days notice in Germany before checking up on a farm. The vet also says that serious problems at the farm cannot be hidden or made good in 48 hours.

My down contacts add to this that farmers in Eastern Europe too were not that open to unannounced visits in their experience. They also say that time and travel costs are big factors to be considered. Going all the way to Moldova or Transnistria is not so great if you cannot get access to the farm

Notes from October Meeting

- I think visual inspections are really useful and would make it easier to organize unannounced visits.
- we know when a flock is started at a farm, and when the slaughter dates are; will therefore **plan to have unannounced visits between the 9th and 12th week to catch any evidence of live plucking**
- in China flocks are mostly kept all year round so unannounced visits can be done all year as well
- FOUR PAWS sets this up through contracts (with the slaughterhouses) – the name and

picture of the auditor will be included, along with a commitment to meet hygiene requirements

Discussion

- concern about what impact this may have on the adoption of the RDS: **given that this approach would require slaughterhouses to have all of their farms sign an agreement to allow surprise audits, there is the concern that some may choose not to be certified to the RDS, as they may not be able to get all of their farms to sign, which would mean that they would have a decrease in supply**
- note that **surprise visits would have to happen early in the season so that the flow of goods through the supply chain can all be certified. This means that the farmers will likely have an idea of when the surprise visits are likely to happen.**
- We will ask for further input, particularly from supply chain members, as it is critical that we keep this standard both effective and adoptable
- **Oct 28:** Concern that auditors will not be able to find farms, AND that they will not be able to inspect paperwork, which is critical for traceability
 - o All Year 1 farms are 100% inspected by announced visits, then 10% unannounced visual-only follow-up
 - o Year 2+ farms will be 70% announced, 30% unannounced
 - o In any given year, there will be a combination of Year 1 and Year 2+ farms, which will require additional coordination from the CB

2. On what basis should the certification body decide on which sites will receive unannounced visits?]

- balance of risk and random, based on CB – discuss what we'd consider to be risk factors in order to give guidance
- please submit any suggestions on risk factors to be considered

Oct 28:

- results from previous audits
- any third party information
- parent farms
- if there has just been an unannounced audit (they feel they will be safe in the next year)
- large size (greater amount of down that will be impacted)
- other?

Timing risks of live-plucking, including regional

3. What strategy shall we use for unannounced visits? (What auditor protocols would help make this feasible?)

- will have location information from announced visits and slaughterhouse information
- have farmers sign that they understand that there may be unannounced visits

- auditor can sign that they will take necessary steps to prevent spread of disease; farmer can specify any specific steps they need

FOUR PAWS:

Knowledge of GPS farm location, essential data on dimensions of farm, number of animals kept and age of animals (to ensure visits take place around dates where plucking may take place for geese it may be between the 9th and 12th week) should be known ahead of the visit.

Allowance to enter the farm should be clarified in advance and firmly agreed via contracts (bilateral contracts can regulate and allow for anything two parties agree to) and letters of authorization (e.g. a contract could be made between the slaughterhouse and inspecting body.)

Slaughterhouses normally have annual contracts with farms in these contracts or other forms of communication with the farms, the slaughterhouse can state that unannounced inspections are authorized to Control Union and that Control Union inspectors will abide by safety standards.

(Note from RDS auditor: In China many goose-farms have their own slaughter facility on site so this contract would not be possible. The next step would be the collector but they often don't have contracts and have very small leverage because down is low value to the farms.)

Additionally, the slaughterhouse can prepare a letter of authorization in the local language and English stating that RDS certifiers are to be allowed to enter the farm (while inspectors are required to show an official ID and adhere to hygiene regulations).

4. What if an unannounced visit takes place and for whatever reason the auditors don't get access to the farm: Will there be another visit a few weeks later? And who covers the costs? The visual inspection can be acceptable now.

- this would be a failed certification, unless there is a strong reason for the visit to be delayed (eg; absence of owner)

- added cost shared across the total price of certification for all sites

- accreditation oversight will be needed to ensure that CB's do not conduct their unannounced audits all in one easily accessible area just for the sake of keeping costs down